

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

X CORP., a Nevada corporation,

Plaintiff,

v.

**MEDIA MATTERS FOR AMERICA, a
Washington, D.C. non-profit corporation,
ERIC HANANOKI, and ANGELO
CARUSONE,**

Defendants.

Civil Action No. 4:23-cv-01175-O

**NOTICE OF DEFENDANTS' 28 U.S.C § 1404(a) AND 1406(a)
MOTION TO TRANSFER VENUE**

Defendants Media Matters for America, Eric Hananoki, and Angelo Carusone file this Notice of Defendants' 28 U.S.C. § 1404(a) and 1406(a) Motion to Transfer Venue. Defendants move the Court to transfer this case to the Northern District of California under 28 U.S.C. § 1404(a) or, alternatively, to transfer or dismiss under 1406(a).

Defendants are filing contemporaneously with this Notice a Motion to Seal Defendants' Brief in Support of Their 28 U.S.C. § 1404(a) and 1406(a) Motion to Transfer Venue. For the reasons stated in the accompanying Brief in Support, Defendants request that the Court enter an Order transferring this case.

Respectfully submitted,

SUSMAN GODFREY L.L.P.

/s/ Justin Nelson

Justin Nelson (TX 24034766)
Matthew C. Behncke (TX 24069355)
1000 Louisiana, Suite 5100
Houston, TX 77002
Telephone: (713) 651-9366
Facsimile: (713) 654-6666
jnelson@susmangodfrey.com
mbehncke@susmangodfrey.com

Katherine Peaslee (CA 310298)
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Telephone: (310) 789-3100
Facsimile: (310) 789-3150
kpeaslee@susmangodfrey.com

GIBSON, DUNN & CRUTCHER LLP
Andrew LeGrand (TX 24070132)
2001 Ross Avenue, Suite 2100
Dallas, TX 75201
T: (214) 698-3100
F: (214) 571-2960
alegrand@gibsondunn.com

Gregg Costa
811 Main Street Suite 3000
Houston, TX 77002
T: (346) 718-6649
F: (214) 571-2960
gcosta@gibsondunn.com
Theodore J. Boutrous, Jr.* (CA 132099)
333 South Grand Avenue
Los Angeles, CA 90071
T: (213) 229-7000
F: (213) 229-7520
tboutrous@gibsondunn.com

Amer S. Ahmed* (NY 4382040)
200 Park Avenue
New York, New York 10166
T: (212) 351-4000

F: (212) 351-4035
aahmed@gibsondunn.com

*Attorneys for Defendants Media Matters for America,
Eric Hananoki, and Angelo Carusone*

CERTIFICATE OF CONFERENCE

Counsel for Plaintiff has conferred with counsel for Defendant on March 5, 2025, and counsel for Plaintiff is opposed as to the disposition of the matters raised in this motion.

s/ Matthew C Behncke

Matthew C Behncke

CERTIFICATE OF SERVICE

I certify that on March 6, 2025, a true and correct copy of this pleading was properly served on counsel of record via electronic filing in accordance with the USDC, Northern District of Texas Procedures for Electronic Filing.

s/ Matthew C Behncke

Matthew C Behncke